

## **REMARKS**

In response to the Office Action mailed December 23, 2002, Applicant respectfully requests reconsideration of this application, as amended, and consideration of the following remarks.

### **Amendments**

#### ***Amendments to the Claims***

Applicant has amended the claims to more particularly point out that Applicant's database as claimed encodes relationships between semantic concepts represented by a plurality of entries in the database. No new matter has been added as a result of these amendments.

### **Rejections**

#### ***Rejections under 35 U.S.C. § 103***

##### **Claims 1-88**

Claims 1-88 stand rejected under 35 U.S.C. § 103(a) as being obvious over Bahl et al. (U.S. Patent 5,033,087) in view of Hargrave, III et al. (U.S. Patent 6,131, 082). Hargrave qualifies as prior art under 35 U.S.C. § 102(e) based on its issue date of October 10, 2000. Applicant does not admit that Hargrave is prior art and reserves the right to swear behind the reference at a later date. Nonetheless, Applicant respectfully submits that the combination of Bahl and Hargrave does not teach each and every element of the invention as claimed in claims 1-88.

Bahl discloses a speech recognition system that creates a decision tree structure that represents variations in the pronunciation of phonemes based on their context in training data. When speech is received, the system determines what word was spoken by comparing the context of the received speech with the contexts in the structure.

Hargrave discloses a structure for translating text strings from a source to a target language. The structure includes an inverted index containing an entry for each unique n-gram found in sample documents in the source language. Each entry contains a weight for the n-gram, a list of pointers to "posting vectors" for the n-gram, and a count of the number of posting vectors.

As well known in the art, phonemes are basic units of sounds that comprise spoken words, and n-grams are strings of words that represent common word sequences in a spoken language. In contrast, Applicant's invention as claimed in claims 1-88 utilizes semantic concepts found in both written and spoken language text, which are represented as entries in a database. Furthermore, the database encodes relationships between semantic concepts represented by the database entries. Neither Bahl nor Hargrave disclose or suggest a structure that represents semantic concepts or that encodes relationships between semantic concepts as does Applicant's claimed database. Therefore, the combination cannot render obvious Applicant's invention as claimed in claims 1-88, and Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

#### **SUMMARY**

Claims 1-88 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.

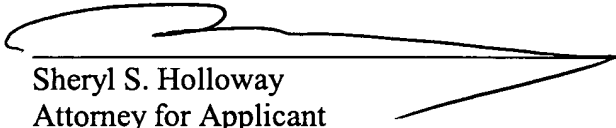
**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR  
& ZAFMAN LLP

Dated: MARCH 24, 2003



Sheryl S. Holloway  
Attorney for Applicant  
Registration No. 37,850

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, CA 90025-1026  
(408) 720-3476